

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
XAVIER GALLON	:	VIOLATION: 18 U.S.C. § 1956(a)(3) (Money laundering - 2 counts)

## COUNTS ONE AND TWO

1. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

knowingly conducted and attempted to conduct the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
One	11/15/01	Wire transfers of approximately \$30,000, from Philadelphia to California, through the following six separate wirings: \$5,000 from “Anthony Jeffries” to “Steve Ibraham;” \$6,000 from “Andrew Johnson” to “Victoria Reyes;” \$6,000 from “Albert Jordan” to “Ronald Barnes;” \$3,000 from “Albert Jordan” to “Victoria Reyes;” \$4,000 from “Anthony Johnston” to “Steve Ibraham;” and \$6,000 from “Andrew Joyner” to “Kathryn Chinn.”
Two	12/13/01	Wire transfers of approximately \$15,000, from Philadelphia, through three separate wirings of \$7,500 from “Andrew Johnson” to “Melissa Alvarez” in Puerto Rico; \$4,000 from “Albert James” to “Orlando Martin” in California; and \$3,500 from “Anthony Jones” to “Hector Flores” in Arizona.

2. When conducting and attempting to conduct each of the financial transactions described in paragraph 1 above, defendant XAVIER GALLON knew that the money involved in each financial transaction was represented to be the proceeds of some form of unlawful activity.

3. Each financial transaction described in paragraph 1 was represented by a law enforcement officer to involve the proceeds of a specified unlawful activity, that is, possession with intent to distribute cocaine, and defendant XAVIER GALLON acted with the intent to promote the carrying on of the specified unlawful activity, and knowing that each transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, and knowing that each transaction was designed in whole or in part to avoid a transaction reporting requirement under federal law.

In violation of Title 18, United States Code, Sections 1956(a)(3)(A), 1956(a)(3)(B), and 1956(a)(3)(C).

---

PATRICK L. MEEHAN  
United States Attorney